

EXHIBIT
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Bossier Parish Clerk of Court C-166988
Filed Mar 21, 2022 11:15 AM A
Katie F. Best
Deputy Clerk of Court

TIA N. MAULDIN	DOCKET NO. _____
VERSUS	26TH JUDICIAL DISTRICT COURT
RICHARD L. SADDLER, JR., ET AL	BOSSIER PARISH, LOUISIANA
ASSIGNMENT:	SECTION _____ JUDGE _____

PETITION FOR DAMAGES

The petition of **TIA N. MAULDIN**, person of lawful age, individually, resident of and domiciled in the State of Louisiana, who upon information and belief, respectfully represents that:

1.

Made defendants herein are:

- 1. **RICHARD L. SADDLER, JR.**, a person of the full age of majority and domiciled in the State of Arkansas who may be served through the Louisiana Long Arm Statute at his address 734 Polk County Road 16, Cove, Arkansas 71937 and also through Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809
- 2. **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, who upon information and belief is a foreign corporation authorized to do and doing business in the State of Louisiana, who at all material times herein was the employer of **RICHARD L. SADDLER, JR.** and which may be served through the registered agent, Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, Louisiana 70802
- 3. **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, who upon information and belief is a domestic insurance corporation, authorized to do and doing business in the State of Louisiana, who at all material times herein was the liability insurer which covered **RICHARD L. SADDLER, JR.** and **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** and which may be served through its agent of service, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809

2.

Said defendants are indebted jointly, severally, and in solido unto your petitioner, **TIA N. MAULDIN**, in an amount of damages reasonably calculated to adequately compensate her for the injuries and damages sustained in an automobile collision that occurred on or about July 2, 2021 at approximately 5:48pm, along Barksdale Boulevard, Bossier City, Bossier Parish, Louisiana, all of which is more particular plead and described hereinafter; together with legal interest from the date of judicial demand until paid and for costs of these proceedings.

3.

On or about July 2, 2021 at approximately 5:48pm, **TIA N. MAULDIN** was the restrained driver of a 2019 Dodge Caravan SE, Louisiana license plate 655DHW, heading south on Barksdale Boulevard in Bossier City, Bossier Parish, Louisiana, obeying all local, state, and federal traffic laws.

4.

On that date, **RICHARD L. SADDLER, JR.** was operating the 2015 Ford F250 Super Duty, Texas license plate FJJ4367, owned by **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** and insured by **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, turning left

northbound on Barksdale Boulevard in Bossier City, Bossier Parish attempting to make a left turn, failed to maintain proper lookout, thereby colliding with TIA N. MAULDIN'S vehicle causing severe personal injury.

NEGLIGENCE ALLEGATIONS AS TO RICHARD L. SADDLER, JR.

5.

The petitioner shows that defendant, **RICHARD L. SADDLER, JR.**, is responsible and strictly liable to the petitioner, for the damages suffered, and was the cause of the aforesaid accident and damages.

6.

The petitioner shows that defendant, **RICHARD L. SADDLER, JR.**, is responsible and strictly liable to the petitioner, for the damages suffered, and was the cause of the aforesaid accident and damages and as such the liability policy of **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** with **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** covered **RICHARD L. SADDLER, JR.**.

7.

RICHARD L. SADDLER, JR. operated the above-mentioned automobile, as such the liability policy of **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** with **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** covered **RICHARD L. SADDLER, JR.**.

8.

The petitioner shows that defendant, **RICHARD L. SADDLER, JR.**, is responsible and strictly liable to the petitioner for the damages suffered, and was the cause of the aforesaid accident and said accident and resultant injuries and losses suffered by the petitioner, **TIA N. MAULDIN**, were due proximately to the actions and omissions of negligence, carelessness, fault and recklessness of **RICHARD L. SADDLER, JR.**, in the following nonexclusive particulars:

- (a) Reckless and careless operation of the vehicle;
- (b) Failure to maintain a proper lookout;
- (c) Improper lane usage;
- (d) Failure to properly apply brakes on the automobile so as to avoid and/or prevent it from colliding with other vehicles;
- (e) In being inattentive and not doing what he should have done or seeing what he should have seen in order to avoid the accident;
- (f) Negligence per se by violating state and municipal traffic laws;
- (g) Other acts or omissions which shall be more fully developed at the trial on this matter.

**NEGLIGENCE ALLEGATIONS AS TO HELMERICH & PAYNE INTERNATIONAL
DRILLING CO.**

9.

HELMERICH & PAYNE INTERNATIONAL DRILLING CO. had a duty to communicate, establish and enforce screening, training, and supervision procedures to prevent acts of the nature described herein. This breach of duty by **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** caused Plaintiff's injuries and harm. **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** was negligent in its hiring, retention, training, and supervision of its employees. This negligence as jointly a cause of plaintiff's harm.

10.

RICHARD L. SADDLER, JR. was an incompetent and/or reckless driver, and a direct proximate result of such was an accident with **TIA N. MAULDIN**.

11.

Defendant, **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, knew or should have known **RICHARD L. SADDLER, JR.** to be an incompetent and/or reckless driver.

12.

Defendant, **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, was negligent by allowing **RICHARD L. SADDLER, JR.** the use of the vehicle proximately caused the accident at issue herein.

13.

Defendant, **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, provided insurance coverage to **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** for negligent entrustment and respondent superior of the vehicle in question and/or negligence for **RICHARD L. SADDLER, JR.** operating the motor vehicle.

TIA N. MAULDIN'S DAMAGES

14.

As the proximate result of the negligence of the defendants mentioned hereinabove, petitioner, **TIA N. MAULDIN**, sustained severe personal injuries, continuing physical and emotional and psychological injuries due to the accident as can best be described by the petitioner's treating physicians.

15.

TIA N. MAULDIN has suffered from pain in the right leg, left shoulder and lower back, continual discomfort, mental anguish and distress to date all of which will continue for an indefinite period of time and which have resulted in hospital, medical and other related expenses, all of which will likewise continue into the future for an indefinite period of time.

16.

The petitioner specifically pleads the following damages:

- A) Past medical expenses;
- B) Future medical expenses;
- C) Past and future physical pain and suffering;
- D) Past and future mental pain and anguish; and,
- E) Loss of enjoyment of life.
- F) Past and future loss of wages.
- G) Loss of earning capacity.

ADDITIONAL ALLEGATIONS

17.

The petitioner avers that it will be necessary to employ experts herein, including medical experts, to testify at the trial of this matter and as such a result, the expert witness' fees should be taxed as costs and defendants should be condemned to pay same along with all other costs.

18.

Upon information and belief, at all times mentioned, **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** was the liability insurer of the vehicle owned by **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** and operated by **RICHARD L. SADDLER, JR.** and had issued a public liability policy which is believed to be insuring losses, damages and injuries of the nature and situation those hereinafter described and herein sued on, and that by virtue of the existence of said policy, which was in full force and effect, the petitioner has a right of direct action against **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.**

19.

Upon information and belief, at all times mentioned, **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** was the liability insurer of the vehicle operated by **RICHARD L. SADDLER, JR.** and had issued a public liability policy which is believed to be insuring losses, damages and injuries of the nature and situation those hereinafter described and herein sued on, and that by virtue of the existence of said policy, which was in full force and effect, the petitioner has a right of direct action against **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.**

20.

Pursuant to the Louisiana Code of Civil Procedure, an order should be issued herein directed to the defendants, **RICHARD L. SADDLER, JR., HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,** ordering each to produce and make available to the petitioner the original or a certified copy of any

and all insurance policies, including all attachments, endorsements and excess policies, which provided coverage for the injuries and damages sustained by petitioner as a result of the above described accident.

21.

The defendants have in their possession the following documents which are necessary and material to the intelligent preparation of petitioner's case and same should be filed and produced into Court for inspection and/or copying by petitioner at the earliest practical date. By them and evidence derived therefrom, petitioner will prove the allegations set fourth in this petition. Said documents are:

- A) Statements taken from **TIA N. MAULDIN**;
- B) Photographs taken of the vehicles involved;
- C) Photographs taken at the scene of the accident; and,
- D) Any policies of public liability or property damage insurance covering this accident.

22.

And now, pleading in the alternative and only in the alternative, if this Honorable Court should hold and find that the petitioner, **TIA N. MAULDIN**, was negligent, then and in that event, petitioner shows that the defendants are liable to petitioner, in solido, in the amount to be in proportion to the degree or percentage of negligence or fault attributable to each part as provided under the comparative Negligence Laws of the State of Louisiana.

23.

The petitioner attaches certain interrogatories, request for production of documents and request for admissions to each defendant's service copy of this original Petition, which defendants are to answer in writing, under oath, within the time delays provided by law and to provide copies of their answers to the petitioners' attorney.

24.

At all times material herein, **RICHARD L. SADDLER, JR.**, defendant, was in the employ of **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, and was in the course and scope of that employment at the time of the accident which is the basis for this action.

25.

HELMERICH & PAYNE INTERNATIONAL DRILLING CO. had a duty to communicate, establish and enforce screening, training, and supervision procedures to prevent acts of the nature described herein. This breach of duty by **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** caused Plaintiff's injuries and harm. **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** was negligent in its hiring, retention, training, and supervision of its employees. This negligence as jointly a cause of plaintiff's harm.

26.

The petitioner alleges amicable demand without avail.

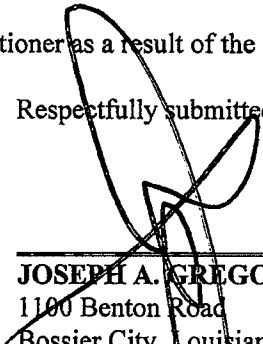
WHEREFORE, Petitioner respectfully prays that this petition be filed into the record and made part thereof, that defendants, **RICHARD L. SADDLER, JR., HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, be served with a copy of their petition and duly cited to appear and answer same, and that after all legal delays and due proceedings are had, there be judgment rendered in favor of petitioner, **TIA N. MAULDIN**, and against the defendants herein for the following: (1) such damages as are reasonable, with legal interest from date of judicial demand; (2) that defendants be directed to answer the attached interrogatories, request for production of documents and request for admissions; (3) that expert witness fees be fixed and taxed as costs; and, (4) any and all relief, general and equitable, to which petitioner may be entitled, and (5) trial by jury.

TIA N. MAULDIN, FURTHER PRAYS, that defendants be directed to produce and file into Court, within the delays allowed by law for pleading to this petition, the following documents:

- A) Statements taken from **TIA N. MAULDIN**;
- B) Photographs taken of the vehicles involved;
- C) Photographs taken at the scene of the accident; and,
- D) Any policies of public liability or property damage insurance covering this accident.

TIA N. MAULDIN, FURTHER PRAYS that an order issue herein, directed to the defendants, ordering them to produce and make available to the petitioner the original or a certified copy of any and all insurance policies, including all attachments, endorsements and excess policies, which provided coverage for the injuries and damages sustained by petitioner as a result of the above described accident.

Respectfully submitted:


JOSEPH A. GREGORIO
1100 Benton Road
Bossier City, Louisiana 71111
Telephone No. (318) 747-0384
Telecopier No. (318) 746-5222
LA Bar Roll No. 22,191
ATTORNEY FOR PLAINTIFF, MAULDIN

PLEASE PERSONALLY SERVE:

RICHARD L. SADDLER, JR.
Through the Louisiana Long Arm Statute
734 Polk County Road 16
Cove, Arkansas 71937

RICHARD L. SADDLER, JR.
Through the Louisiana Secretary of State
8585 Archives Avenue
Baton Rouge, Louisiana 70809

**PERSONAL SERVICE ONLY is to be made on the above named agent for service of process
as per La. C.C.P. Article 1261.**

HELMERICH & PAYNE INTERNATIONAL DRILLING CO.

Through the registered agent
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, Louisiana 70802

**PERSONAL SERVICE ONLY is to be made on the above named agent for service of process
as per La. C.C.P. Article 1261.**

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA

Through its agent of service
Louisiana Secretary of State
8585 Archives Avenue
Baton Rouge, Louisiana 70809

**PERSONAL SERVICE ONLY is to be made on the above named agent for service of process
as per La. C.C.P. Article 1261.**

Bossier Parish Clerk of Court
Filed Mar 21, 2022 11:15 AM
Katie F. Best
Deputy Clerk of Court

C-166988
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TIA N. MAULDIN

DOCKET NO. _____

VERSUS

26th JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, JR., ET AL

BOSSIER PARISH, LOUISIANA

ASSIGNMENT:

SECTION ____ JUDGE _____

REQUEST FOR ADMISSIONS

TO: RICHARD L. SADDLER, JR.
HELMERICH & PAYNE INTERNATIONAL DRILLING CO.
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA

YOU ARE HEREBY NOTIFIED that the attached Request for Admissions is served upon you in accordance with LSA-C.C.P. Art. 1466. The requested admissions, if made, shall be for purposes of the above entitled and numbered cause only. Any fact concerning which an admission is requested that is not denied by serving the denial upon the plaintiff through his attorney of record within the appropriate delays after service shall be deemed admitted.

Benton, Bossier Parish, Louisiana this 18 day of MARCH, 2022.

Plaintiff, TIA N. MAULDIN, persons of lawful age, resident of and domiciled in the State of Louisiana, requests that defendants, RICHARD L. SADDLER, JR., HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, admit the truth of the following facts within the appropriate delays after receipt of the request, pursuant to LSA-C.C.P. Art. 1467.

1.

Admit that at the time of the accident, herein sued upon, RICHARD L. SADDLER, JR. was operating the 2015 Ford F250 Super Duty, Texas license plate FJJ4367 turning on Barksdale Boulevard, in Bossier City, Bossier Parish, Louisiana.

2.

Admit that at the time of the accident, herein sued upon, RICHARD L. SADDLER, JR., was operating the 2015 Ford F250 Super Duty, Texas license plate FJJ4367 that was owned by HELMERICH & PAYNE INTERNATIONAL DRILLING CO..

3.

Admit that at the time of the accident, herein sued upon, TIA N. MAULDIN was the driver of a 2019 Dodge Caravan SE, Louisiana license plate 655DHW, obeying all local, state, and federal traffic laws.

4.

Admit that at the time of the accident, RICHARD L. SADDLER, JR. and/or HELMERICH & PAYNE INTERNATIONAL DRILLING CO. were insured by NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.

5.

Admit that at the time of the accident, herein sued upon, RICHARD L. SADDLER, JR. was operating the 2015 Ford F250 Super Duty, Texas license plate FJJ4367, owned by HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and was involved in a vehicle collision on July 2, 2021 at approximately 5:48pm in Bossier City, Bossier Parish, Louisiana.

6.

Admit that **RICHARD L. SADDLER, JR.**, was operating the 2015 Ford F250 Super Duty, Texas license plate FJJ4367, was inattentive and/or distracted and failed to stop timely in order to avoid hitting the preceding vehicle operated by **TIA N. MAULDIN**.

7.

Admit that at the time of the accident, **RICHARD L. SADDLER, JR.** while operating the vehicle, failed to keep proper lookout thereby causing a collision with the vehicle operated by **TIA N. MAULDIN**.

8.

Admit that **TIA N. MAULDIN** has suffered physical, mental and emotional injuries as a result of the collision herein sued upon.

9.

Admit that **TIA N. MAULDIN** has suffered and still suffers severe pain, discomfort, limitation of motion, mental anguish and distress as a result of the collision herein sued upon.

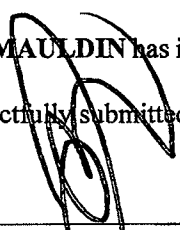
10.

Admit that at the time of the collision, **RICHARD L. SADDLER, JR.**, was in the employ of **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, and was in the course and scope of that employment.

11.

Admit that as a result of the accident herein sued upon, **TIA N. MAULDIN** has incurred medical expenses.

Respectfully submitted:



JOSEPH A. GREGORIO
1100 Benton Road
Bossier City, Louisiana 71111
Telephone No.: (318) 747-0384
Telecopier No.: (318) 746-5222
LA Bar Roll No. 22,191
ATTORNEY FOR TIA N. MAULDIN

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 18 day of May, 2022, served a copy of the foregoing pleading on counsel for all parties to this proceedings, by serving same attached to the foregoing Petition for Damages.



JOSEPH A. GREGORIO

Bossier Parish Clerk of Court
Filed Mar 21, 2022 11:15 AM
Katie F. Best
Deputy Clerk of Court

C-166988
A

TIA N. MAULDIN

DOCKET NO. _____

VERSUS

26th JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, JR., ET AL

BOSSIER PARISH, LOUISIANA

ASSIGNMENT:

SECTION ____ JUDGE _____

**FIRST SET OF WRITTEN INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY PLAINTIFF,
TO DEFENDANT, RICHARD L. SADDLER, JR.**

NOW INTO COURT, through undersigned counsel, comes TIA N. MAULDIN, who propound the following written interrogatories upon Defendant, RICHARD L. SADDLER, JR. (hereinafter sometimes referred to as “you”, “your” or “defendant”), which said interrogatories are to be answered by them fully, completely and under oath within the delays provided by the Louisiana Code of Civil Procedure and which said interrogatories are to be deemed continuing and answered if and when the information sufficient to answer them comes within its knowledge or possession, to-wit:

Definitions and Instructions

1. These interrogatories and requests are deemed continuing interrogatories, requiring supplemental answers thereto to be immediately given in the event that information is discovered, acquired or becomes known to you which would require amendment or supplementation of the answers to these interrogatories in order for your answers to be proper, complete and/or truthful.
2. In answering these interrogatories and requests, furnish such information as is available to you, not merely information you now have of your own personal knowledge. This is deemed to require you to furnish information which is in your possession or which is in the possession of your agents, attorneys and any other person who is subject to your custody or control.
3. If you cannot answer an interrogatory or subpart fully, please answer the interrogatory or subpart to the fullest extent possible, specifying with particularity and in detail the reason(s) for you inability to answer the remainder of the interrogatory or subpart and stating whatever information or knowledge you have concerning the unanswered portion, what information you do not have and what efforts you made to obtain the unknown information.
4. Certain of these interrogatories and requests may ask you to identify documents which “refer or relate” to a particular subject matter. The term “refer or relate” calls for the identification of documents that either have some bearing on the subject or mention the subject, even if only in passing.
5. With regard to information for which you claim a privilege, please state the type of privilege claimed and the statute or case law forming its legal basis.

6. If the answer to any interrogatory or any subpart of any interrogatory is not made from the personal knowledge of the person answering, as to each such interrogatory or subpart identify each person from which, and/or each document from which, information was obtained to make the particular answer and identify each person having personal knowledge of such information.
7. "Document" means any printed, typewritten or handwritten instrument of whatever character of physical expression or any means of storage of information and includes, without limitation, any account ledger, bank statement, canceled check, correspondence, memorandum, contract, agreement, letter, diary, calendar, day-timer, handwritten or typewritten note, computer printout, computer tape, microfilm, microfiche, tape recording, photograph, motion picture, plat, plate, diagram, survey, voice tapes, recordings, other items of a similar nature.
8. "Communication" is the transmission of information from one person to another or in the presence of another whether written, oral, telephonic, electronic or by any other means.
9. "Person" means the plural as well as the singular and includes, without limitation, any natural person as well as any form of legal entity such as a firm, corporation, unincorporated association, partnership or other form of legal entity, unless the context clearly indicates otherwise.
10. "Identify" or "Identity" means to provide the following information and any other additional information which may be specifically requested in a given interrogatory or request:
 - a.) With respect to a natural person, "identification" or "identify" mean to state the person's full name, employer, title, job description, business and home addresses, business and home telephone numbers and his relationship with the adverse party.
 - b.) With respect to a person other than a natural person, including any business entity, "identification" or "identify" means to state its full name, its principal place of business address and its date and place of formation, the type of legal entity which it is, its chief executive officer, the name and address of its agent for service of process in Louisiana and its relationship with the adverse party.
 - c.) With respect to a document, "identification" or "identify" means to state its title, date, author, addressee, all recipients, subject matter or general nature, the file source in which the document is located, the relevant pages to the specific inquiry, the present location of the document and the identity, as used herein, of its custodian. Where both originals and non-identical copies are available, please so state and describe in detail the manner in which each of the non-identical copies differ from the original. Such documents are in your possession, your attorney's possession or the possession of any other person who is subject to your control and whether or not the document is claimed to be privileged. In lieu of identifying any document where all information which the identification of the

document would provide is evident from the document itself, a copy of the original and all non-identical copies may be provided.

d.) With respect to oral statements or communications, “identification” or “identify” means to state the maker, recipient, when made, where made, the persons present when the communication was made, the mode of communication and the subject matter and date of the communication.

11. “Defendant”, “you”, “your” and “adverse party” shall refer to **RICHARD L. SADDLER, JR.**, including, but without limitation, the present or former officers, directors, employees, attorneys, adjusters, accountants, investigators and agents of Defendant.

INTERROGATORIES

INTERROGATORY NO. 1:

State with respect to the defendant(s), the following:

- A) Full, correct name;
- B) Date and place of birth;
- C) Home address and telephone number;
- D) Business or school address and telephone number;
- E) Occupation;
- F) Social Security Number; and,
- G) All prior residence addresses for the five years preceding the accident.

INTERROGATORY NO. 2:

With regard to the actual happening of the incident which is the subject matter of this litigation, give a general statement of how the accident happened.

INTERROGATORY NO. 3:

Please state as accurately as you can, the time when the accident sued upon herein happened, giving the date, hour and minute.

INTERROGATORY NO. 4:

Please state the make, model, VIN number, license plate number and owner’s and operator’s name and address, year of manufacture of the defendants’ vehicle involved in the accident.

INTERROGATORY NO. 5:

Please describe the exact point of the collision, naming the roadway in which such accident happened, and giving the name and the location of the nearest intersecting roadway.

INTERROGATORY NO. 6:

If at the time of the alleged occurrence **RICHARD L. SADDLER, JR.’S** motor vehicle operator's license contained any restrictions of any kind with regard to the operation of any motor

vehicle, please state with full particulars.

INTERROGATORY NO. 7:

Please state where **RICHARD L. SADDLER, JR.** was coming from and where he was going at the time of the accident, giving in the answer the place where **RICHARD L. SADDLER, JR.** last entered the vehicle and his next destination.

INTERROGATORY NO. 8:

Please describe fully and completely how the alleged occurrence happened, stating in the answer all events relating thereto in their sequential order.

INTERROGATORY NO. 9:

Please state the time in minutes and seconds that elapsed between the time that the operator of the motor vehicle first observed **TIA N. MAULDIN** had exited the vehicle and the time of impact.

INTERROGATORY NO. 10:

Please describe as fully as possible the weather and road conditions at the time and location of the alleged occurrence, setting forth conditions of light, precipitation, and temperature.

INTERROGATORY NO. 11:

Please state everything **RICHARD L. SADDLER, JR.** saw **TIA N. MAULDIN** do up to the moment the motor vehicle **RICHARD L. SADDLER, JR.** was operating came in contact with the petitioner.

INTERROGATORY NO. 12:

Please state everything **TIA N. MAULDIN** did as well as everything you did to avoid the accident from the time you first saw **TIA N. MAULDIN** exit the vehicle up to the time of impact.

INTERROGATORY NO. 13:

Please state everything **RICHARD L. SADDLER, JR.** did from the moment he first noticed the petitioner until the moment of the alleged accident.

INTERROGATORY NO. 14:

Please state where the defendant was at the time the operator first saw **TIA N. MAULDIN**, giving measurements and relative position with regard to any identifiable objects in the immediate vicinity, as far as possible.

INTERROGATORY NO. 15:

State whether there was in full force and effect at the time of the accident, a policy providing liability insurance which covered this accident; state whether or not there were any other policies of insurance including umbrella policies in effect which also cover the accident, and if so, the name of the insurer, the policy number, the effective dates of the policy, and the applicable policy limits for each.

Consider this a production of documents attach the copy of all insurance policies covering the accident in question to these interrogatories.

INTERROGATORY NO. 16:

Do you know or does anyone acting on your behalf know of any witnesses to the accident sued upon herein and if so, identify all witnesses; whether anyone acting on your behalf has taken a statement from any of said witnesses and if so, identify the person from whom a statement has been taken or was attempted to be taken, the date of the statement, whether the statement was written or recorded and the name and address of the present possessor of said statement or recording; give the facts known by each said witnesses.

INTERROGATORY NO. 17:

Identify all witnesses whom you or your attorney plan to call as witnesses on your behalf at the trial of this case on the merits, and for each of said witness give the facts which you intend to prove through his or her testimony.

INTERROGATORY NO. 18:

Did you or anyone acting on your behalf obtain a written, recorded or oral statement from the plaintiff(s) and, if so, Identify the persons who took the statement, the type of statement, and the date on which the statement was taken.

INTERROGATORY NO. 19:

Have you or anyone acting on your behalf consulted with or retained anyone who has or claims to have any expertise with respect to any of the issues involved in this litigation and if so please identify any such expert(s); the nature of expertise; the facts known by such expert; whether the expert has rendered an opinion and if so, whether said opinion has been communicated and the date of the communications; whether you or anyone acting on your behalf has a copy of said expert's written opinion and if so, attach a copy thereof to your Answers to Interrogatories; and, whether you or your attorney plan to call said expert as a witness at trial and if so, what fact or facts do you intend to establish through his or her testimony.

INTERROGATORIES NO. 20:

Identify all documentary and physical evidence which you intend to introduce as evidence on your behalf at trial of this case on the merits and for each item give the fact or facts which you intend to establish through introduction thereof.

INTERROGATORY NO. 21:

Please state whether **RICHARD L. SADDLER, JR.** has been charged or arrested for any local, state or federal criminal violations in the last 10 years. If so, state the nature of the charges/violations and the disposition of such charges and/or violations.

INTERROGATORY NO. 22:

Please state whether **RICHARD L. SADDLER, JR.** was, at the time of the accident, or had been consuming/ingesting/using within 72 hours prior to the accident herein sued upon any alcohol, narcotic, drug, stimulant, or medication; and, describe the alcohol, narcotic, drug, stimulant, medication, and in what amount it was taken.

INTERROGATORY NO. 23:

Please state whether **RICHARD L. SADDLER, JR.**, owned a mobile phone at the time of this accident or had access or possessed a mobile phone in the vehicle with him at the time of the accident? If so, please state the phone number and mobile phone carrier/operator which the phone is connected? Please state if you were on the phone at least 15 minutes prior to the accident or 15 minutes after the accident? If so, who did you call and for what reason? Please produce your phone bill for the date in question.

INTERROGATORY NO. 24:

Please state whether **RICHARD L. SADDLER, JR.** was charged with any violation resulting from the accident herein sued upon. State whether said charges are pending or disposed of, and the outcome.

INTERROGATORY NO. 25:

State whether you or any of your employees, agents, officers, or others acting on your behalf have photographs, diagrams, designs, depictions, or surveillance files and if so, please state the number of photographs, the general scene which they depict, or any object or person involved in the accident the day on which said photographs were taken, the persons by whom said photographs were taken, and the person having physical custody or possession of the photographs as of the time of answering of these interrogatories.

INTERROGATORY NO. 26:

If defendant claims plaintiff(s) were guilty of any negligence in connection with this incident, then state precisely in what respects it is claimed the plaintiff(s) were guilty of negligence and what percentage of fault is the plaintiff(s) alleged to have committed.

INTERROGATORY NO. 27:

Do the answers to each and every one of the foregoing interrogatories include not only the information known to you or your attorney, but also all information within the possession or control of your attorney and have you been informed that you are answering these interrogatories under oath and that your answers may be used as evidence at the trial of this matter?

INTERROGATORY NO. 28:

If you contend that you were not acting in the course and scope of your employment at the time

of the accident, please state with specifically why and if so, please state your job duties, rate of pay and working hours.

INTERROGATORY NO. 29:

Please identify who owned and/or leased the vehicle you were driving and please produce rental agreements and all paper work related to the lease of the vehicle you were driving.

PURSUANT TO LOUISIANA CODE OF CIVIL PROCEDURE ARTICLE 1458, PLEASE SIGN YOUR INTERROGATORY ANSWERS, CERTIFYING THAT YOU HAVE READ BOTH THESE INTERROGATORIES AND YOUR ANSWERS TO THEM AND THAT THE ANSWERS ARE TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE.

REQUEST FOR PRODUCTION OF DOCUMENTS

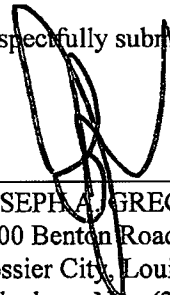
REQUEST FOR PRODUCTION OF DOCUMENT NO. 1:

By way of request for production of documents, please furnish a copy of each statement referred to in your answer to Interrogatories above.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 2:

By way of a request for production of documents, please furnish a copy of each physical and documentary evidence referred to in your answer to Interrogatories above.


Respectfully submitted:



JOSEPH A. GREGORIO
1100 Benton Road
Bossier City, Louisiana 71111
Telephone No.: (318) 747-0384
Telecopier No.: (318) 746-5222
LA Bar Roll No. 22,191
ATTORNEY FOR TIA N. MAULDIN

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 18 day of MARCH, 2022, served a copy of the foregoing pleading on counsel for all parties to this proceedings, by serving same attached to the foregoing Petition for Damages.



JOSEPH A. GREGORIO

Bossier Parish Clerk of Court **C-166988**
Filed Mar 21, 2022 11:15 AM **A**
Katie F. Best
Deputy Clerk of Court

TIA N. MAULDIN

DOCKET NO. _____

VERSUS

26th JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, JR., ET AL

BOSSIER PARISH, LOUISIANA

ASSIGNMENT:

SECTION ____ JUDGE _____

**FIRST SET OF WRITTEN INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS PROPOUNDED TO
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**

Pursuant to the provisions of Louisiana Code of Civil Procedures, Articles 1457, et seq., plaintiff(s), **TIA N. MAULDIN**, propound the following written interrogatories to be answered separately, in writing, under oath, and within the delays allowed by law.

These interrogatories shall be deemed continuing so as to require supplemental answers if you or your attorney obtain further information between the time answers are served and a reasonable time prior to trial.

INTERROGATORY NO. 1:

Identify the person(s) answering these interrogatories by providing the following information:

- A) Full, correct name;
- B) Business or school address and telephone number;
- C) Occupation; and
- D) And by what authority he/she has to answer these interrogatories.

INTERROGATORY NO. 2:

What is the exact name and headquarters of **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**?

INTERROGATORY NO. 3:

Did **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** issue a policy of automobile insurance to **RICHARD L. SADDLER, JR. and/or HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**?

INTERROGATORY NO. 4:

If the answer to the preceding interrogatory was in the affirmative, please state:

- A) When the policy was issued;
- B) The scope/limits of coverage/liability, including the name of such persons covered and the vehicles covered by said policy.

INTERROGATORY NO. 5:

Was the aforementioned insurance policy issued to **RICHARD L. SADDLER, JR. and/or HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** in full force and effect on the date of the

accident in question, that being **July 2, 2021 at approximately 5:48pm**, and provide, in your opinion, coverage of said vehicle with relation to the above mentioned accident?

INTERROGATORY NO. 6:

State the last know address, telephone number and employer of your insured and of **RICHARD L. SADDLER, JR. and/or HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**

INTERROGATORY NO. 7:

When were you first notified, and by whom, of the accident complained of in the Plaintiff's complaint?

INTERROGATORY NO. 8:

List all witnesses the defendant intends to call at the trial of this case, including the following information for each witness:

- A) Name;
- B) Address;
- C) Telephone number;
- D) Place of employment; and,
- E) Summary of the facts to which each witness is expected to testify.

INTERROGATORY NO. 9:

Identify and describe what training was obtained by the insurance adjusters for **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** in evaluating, adjusting and determining the value of a liability claim.

INTERROGATORY NO. 10:

Identify and describe the policies and procedures for adjusting and processing claims; and for establishing a reserve for any claim, at **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.**

INTERROGATORY NO. 11:

Do the answers to each and every one of the foregoing interrogatories include not only the information known to you or your attorney, but also all information within the possession or control of your attorney?

INTERROGATORY NO. 12:

Have you been informed that you are answering these interrogatories under oath and that your answers may be used as evidence at the trial of this matter?

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENT NO. 1:

Please produce a copy of any reports or statements that you, or any representative on your behalf, made or obtained in connection with the subject accident.

REQUEST FOR PRODUCTION OF DOCUMENT NO.2:

Please produce a copy of any photographs of the site of the accident or of any of the vehicles involved in the accident that you, or any representative on your behalf, may have obtained or taken.

REQUEST FOR PRODUCTION OF DOCUMENT NO.3:

Please produce a copy of any reports from any investigation that you, or any representative on your behalf, may have conducted of facts and circumstances surrounding this accident.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 4:

Please provide us with a true and correct copy of all adjustment reports/files, incident reports, investigative files and records, reserve files or records, and any other files or records which are in any way relevant or applicable to this claim/case, together with a true and correct copy of any statements, photographs and other evidence relative to this matter, whether in your possession, the possession of another corporate/insurance representative, your attorney or other person.

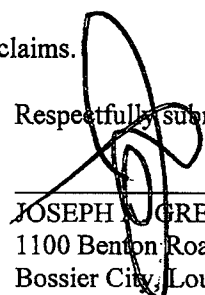
REQUEST FOR PRODUCTION OF DOCUMENT NO. 5:

Please provide us with a true and correct copy of all materials used by **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** for the training of adjusters for evaluating, adjusting and determining value in liability claims, as well as a copy of all materials used by **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** adjusters and agents in reporting all claims from the time the claims are reported through the time they are assigned to any adjuster permanently assigned to the file.

REQUEST FOR PRODUCTION OF DOCUMENT NO. 6:

Please provide us with a true and correct copy of all materials currently being used by **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** for the training of adjusters for evaluating, adjusting and determining value in liability claims.

Respectfully submitted:



JOSEPH A. GREGORIO
1100 Benton Road
Bossier City, Louisiana 71111
Telephone No.: (318) 747-0384
Telecopier No.: (318) 746-5222
LA Bar Roll No. 22,191
ATTORNEY FOR TIA N. MAULDIN

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 18 day of March, 2022, served a copy of the foregoing pleading on counsel for all parties to this proceedings, by serving same attached to the foregoing Petition for Damages.



JOSEPH A. GREGORIO

Bossier Parish Clerk of Court
Filed Mar 21, 2022 11:16 AM
Katie F. Best
Deputy Clerk of Court

C-166988
A

TIA N. MAULDIN

DOCKET NO. _____

VERSUS

26th JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, JR., ET AL

BOSSIER PARISH, LOUISIANA

ASSIGNMENT:

SECTION ____ **JUDGE** _____

**FIRST SET OF WRITTEN INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT,
HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**

NOW INTO COURT comes the plaintiffs, TIA N. MAULDIN through undersigned counsel, who propound to HELMERICH & PAYNE INTERNATIONAL DRILLING CO. the following interrogatories to be answered fully, individually, in writing, and under oath, under the provisions of the Louisiana Code of Civil Procedure Articles 1457 - 1459, within 15 days after service hereof; and in default of the full, complete, and timely answer thereto, plaintiff demands that you pay all reasonable attorney's fee, costs, and expenses of compelling answer to the same.

INSTRUCTIONS

- Each interrogatory shall be answered separately and fully in writing under oath, unless it is objected to, in which event, the reasons for objection shall be stated in lieu of answer.
- The answer shall be signed by the person making them, and the objections signed by the person or attorney making them.
- Whenever an estimate rather than exact information has been used in your answers, please state that your response is an estimate and state all reasons why exact information is unavailable.
- The answers to these interrogatories are to be served upon plaintiff, through their undersigned counsel of record, within fifteen (15) days after service of these interrogatories.
- Failure to comply is subject to the sanctions under the Louisiana Code of Civil Procedure.
- These interrogatories are to be considering continuing, so as to require supplemental answers under oath, in writing, at any time that additional information may be obtained after responses are filed to these interrogatories.

DEFINITIONS

As used in these Interrogatories, the terms listed below are defined as follows:

- "You" or "your" means defendants and all representatives or other persons acting on behalf of defendants.
- "Document" means any written, recorded or graphic matter however produced or reproduced.
- "Identify" or "identification" when used with respect to an individual means to state his full name, his present or last known employment, and his present or last known address.
- "Identify" or "identification" when used with reference to a document means to state the type of document (e.g., lease, memorandum, contract, telegram, chart, etc.) or some other means of identifying its location and custodian, the date thereon, if any, and the identity of the party or parties whose name or names appear thereon, or in lieu thereof, you may attach to your answers a copy of each such document.
- "And" means both the conjunctive "and" and the disjunctive "or" and the words "and/or".

- "He", "him" or "his" when referring to any person shall be deemed to include all other genders and the singular shall be deemed to include the plural.

INTERROGATORY NO. 1:

Please identify yourself and any person assisting you or providing information by giving in your answer your full name(s), address(s), your present telephone number(s), your occupation(s).

INTERROGATORY NO. 2:

Please provide the following concerning all witnesses, including any expert witnesses you intend to call at trial of the above captioned matter.

- a) Identify, including name, address, each witness.
- b) Please state the subject matter on which the witness is expected to testify.
- c) Please state which of the witnesses listed will be called at the trial of this matter.

INTERROGATORY NO. 3:

What is the full name of your company? Has it been correctly named in the Plaintiff's Petition? Is your company owned by a subsidiary of another company? If so, state the full name of the other company?

INTERROGATORY NO. 4:

Is your company a common carrier, a contract carrier, or a private carrier?

INTERROGATORY NO. 5:

On the date of the accident did your company hold a certificate of authority, a license or a permit issued by the Interstate Commerce Commission or the State of Louisiana for the vehicle involved in the accident at issue? Is so, please identify which and produce it.

INTERROGATORY NO. 6:

If you hold any type of authority, license or permit to engage in interstate and/or intrastate commerce, state what that is, and the origin of such.

INTERROGATORY NO. 7:

Who was the owner of the vehicle involved in the accident? Please give the full name and address of the owner.

INTERROGATORY NO. 8:

Describe the vehicle by stating the year of manufacture, manufacturer, model and configuration. State the height, length and width of the vehicle.

INTERROGATORY NO. 9:

If the vehicle were being operated by your company under a lease, state the name, address, and telephone number of the person who was the lessor of the vehicle; producing a copy of said lease.

INTERROGATORY NO. 10:

State the name, address, and telephone number of the driver of the involved in the accident. If he or

she is your regular employee then state the date that the employment began and whether he or she is still in your employ.

INTERROGATORY NO. 11:

State whether you have retained a driver qualification file in your company offices for the driver of the vehicle. If so, please list each document within that file.

INTERROGATORY NO. 12:

State whether you have any knowledge of any traffic violations committed by the driver either while in your employ or in previous employment. If your replied affirmatively, please state what information you have in that regard and produce same.

INTERROGATORY NO. 13:

State whether any disciplinary action was taken either by your company or a company union against the driver as a result of his or her driving that resulted in this accident. If not, please state whether any such action was considered. Was his or her action reviewed by any person(s)? If so, please state in details of such review.

INTERROGATORY NO. 14:

State whether your company has a safety director. If so, please state his or her name and full title.

INTERROGATORY NO. 15:

State whether your company has written driving standards and/or instructions for its drivers.

INTERROGATORY NO. 16:

State the method by which compensation was determined for the payment of the driver and/or lessor for the trip during which the accident occurred.

INTERROGATORY NO. 17:

State the place of origin and the place of destination of the vehicle involved in this accident.
State the exact time when the vehicle left its place of origin and what the scheduled time of arrival was at the place of destination.

INTERROGATORY NO. 18:

State whether your company is in possession of the driver's logs for the trip.

INTERROGATORY NO. 19:

State whether your company is in possession of the bill of lading, freight bill and expense invoices generated during the course of the trip.

INTERROGATORY NO. 20:

Does your company retain possession of repair and warranty invoices and bills covering the history of the vehicle? If not, who does?

INTERROGATORY NO. 21:

Does the vehicle involved in the accident have an on-board computer? If so, identify all disks, computer tapes and other written materials generated by the use of the on-board computer during the trip, further identifying whether or not these items are in your company's possession.

INTERROGATORY NO. 22:

Have you ever been notified by the vehicle driver of a conviction(s) or suspension(s) for violating a state or local law relating to motor vehicle traffic control?

INTERROGATORY NO. 23:

Has the vehicle driver ever been disqualified from driving a vehicle when in your employ? If so, when and under what circumstances?

INTERROGATORY NO. 24:

Has your company ever undergone a FHWA compliance review? If so, what was your rating? (Either satisfactory, conditional, or unsatisfactory).

INTERROGATORY NO. 25:

Identify all insurance policies covering the vehicle involved in the accident? Please state the amount of coverage for each policy.

INTERROGATORY NO. 26:

State whether the driver of the vehicle was assigned or had in his possession at the time of the accident, a mobile telephone. If so, please provide the carrier name and phone number along with a copy of the bill for the date in question.

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

NOW INTO COURT, through undersigned counsel, come plaintiffs who request, pursuant to Louisiana Code of Civil Procedure Article 1461, et seq., within 15 days after service hereof, that defendant, **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.**, produce and permit counsel for plaintiffs to inspect and copy the documents requested herein at the office of Joseph A. Gregorio, 1100 Benton Road, Bossier City, Louisiana 71111

INSTRUCTIONS

- Each request shall be answered separately and fully in writing under oath and by providing documentary evidence, unless it is objected to, in which event, the reasons for objection shall be stated in lieu of answer.
- The written response shall be signed by the person making them, and the objections signed by the person or attorney making them.
- The responses to these requests are to be served upon plaintiff, through her undersigned counsel of record, within fifteen (15) days after service of these interrogatories.

- Failure to comply is subject to the sanctions under the Louisiana Code of Civil Procedure.
- These requests are to be considering continuing, so as to require supplemental responses under oath, in writing and by providing additional documentary evidence, at any time that additional information may be obtained after responses are provided to these requests.
- All document requests are for the period of time existing from 24 hours prior to the accident up to the subject accident and reference documents related to the vehicle, vehicle, tank, tractor, driver, and/or co-driver involved in the subject accident.

DEFINITIONS

As used in these requests, the terms listed below are defined as follows:

- "You" or "your" means defendants and all representatives or other persons acting on behalf of defendants.
- "Document" means any written, recorded or graphic matter however produced or reproduced.
- "Identify" or "identification" when used with reference to a document means to state the type of document (e.g., lease, memorandum, contract, telegram, chart, etc.) or some other means of identifying its location and custodian, the date thereon, if any, and the identity of the party or parties whose name or names appear thereon, or in lieu thereof, you may attach to your answers a copy of each such document.
- "And" means both the conjunctive "and" and the disjunctive "or" and the words "and/or".
- "He", "him" or "his" when referring to any person shall be deemed to include all other genders and the singular shall be deemed to include the plural.

REQUEST FOR PRODUCTION NO. 1:

Please provide a copy of all tachometer records.

REQUEST FOR PRODUCTION NO. 2:

Please provide a copy of all on-board computer records.

REQUEST FOR PRODUCTION NO. 3:

Please provide a copy of all dispatch records.

REQUEST FOR PRODUCTION NO. 4:

Please provide a copy of all fax transmission from or to the vehicle.

REQUEST FOR PRODUCTION NO. 5:

Please provide a copy of all, mobile phone records for the telephone assigned to the driver.

REQUEST FOR PRODUCTION NO. 6:

Please provide a copy of all mobile radio transmission records.

REQUEST FOR PRODUCTION NO. 7:

Please provide a copy of all, wrecker or tow vehicle records.

REQUEST FOR PRODUCTION NO. 8:

Please provide a copy of the vehicle and vehicle license.

REQUEST FOR PRODUCTION NO. 9:

Please provide a copy of all pick up and delivery records.

REQUEST FOR PRODUCTION NO. 10:

Please provide a copy of all trip summaries.

REQUEST FOR PRODUCTION NO. 11:

Please provide a copy of all delivery manifests.

REQUEST FOR PRODUCTION NO. 12:

Please provide a copy of all credit card receipts, showing purchases made by the driver or co-driver.

REQUEST FOR PRODUCTION NO. 13:

Please provide a copy of all toll tickets.

REQUEST FOR PRODUCTION NO. 14:

Please provide a copy of all fuel tax records.

REQUEST FOR PRODUCTION NO. 15:

Please provide a copy of all fuel receipts.

REQUEST FOR PRODUCTION NO. 16:

Please provide a copy of the registration and title to the vehicle.

REQUEST FOR PRODUCTION NO. 17:

Please provide a copy of all expense sheets.

REQUEST FOR PRODUCTION NO. 18:

Please provide a copy of all vehicle interchange records.

REQUEST FOR PRODUCTION NO. 19:

Please provide a copy of all bills of lading.

REQUEST FOR PRODUCTION NO. 20:

Please provide a copy of all manifests and waybills.

REQUEST FOR PRODUCTION NO. 21:

Please provide a copy of any rental contract involving the vehicle.

REQUEST FOR PRODUCTION NO. 22:

Please provide a copy of all written responses from each state agency contacted with reference to vehicle driver's driving record.

REQUEST FOR PRODUCTION NO. 23:

Please provide a copy of all written records with respect to each past employer who was contacted about the driver's qualifications.

REQUEST FOR PRODUCTION NO. 24:

Please provide a copy of the driver's qualification file, including employee's application, list of vehicle driver's previous employers for the past 10 years preceding the date of application, the reasons for leaving said employment, medical examiner's certificate, a note showing when and who reviewed the driver's record with him or her for each year of employment, records of drug and alcohol tests, and an accident register listing all DOT recordable preventable accidents.

REQUEST FOR PRODUCTION NO. 25:

Please provide a copy of the vehicle driver's list of violations of motor vehicle traffic laws.

REQUEST FOR PRODUCTION NO. 26:

Please provide a copy of driver's personnel file.

REQUEST FOR PRODUCTION NO. 27:

Please provide a copy of all National Transportation Safety Board investigative reports.

REQUEST FOR PRODUCTION NO. 28:

Please provide a copy of all driver's logs for the past 3 months.

REQUEST FOR PRODUCTION NO. 29:

Please provide a copy of all vehicle maintenance records of the commercial motor vehicle involved in the accident for the past 6 months.

REQUEST FOR PRODUCTION NO. 30:

Please provide a copy of the accident report.

REQUEST FOR PRODUCTION NO. 31:

Please provide a copy of all repair invoices during that the vehicle has been operated in your behalf.

REQUEST FOR PRODUCTION NO. 32:

Please provide a copy of all lease and trip lease contracts between you and the vehicle owner and operator.

REQUEST FOR PRODUCTION NO. 33:

Please provide a copy of all trip reports.

REQUEST FOR PRODUCTION NO. 34:

Please provide a copy of all writings giving notification to you of the vehicle driver's convictions or suspensions for violating a state or local law relating to motor vehicle traffic control.

REQUEST FOR PRODUCTION NO. 35:

Please provide a copy of all writings containing the results of any drug or alcohol test that were administered to the vehicle driver after the accident.

REQUEST FOR PRODUCTION NO. 36:

Please provide a copy of all records of driver alcohol tests with a confirmed reading of .02 percent or greater, confirmed positive test results, documentation of refusals to take alcohol and/or drugs tests, instrument calibration documentation, driver evaluation by a substance abuse professional and calendar year summaries for the last 5 years.


REQUEST FOR PRODUCTION NO. 37:

Please provide a copy of all company manuals covering vehicle safety, maintenance, fleet safety programs, and driver's standards.

REQUEST FOR PRODUCTION NO. 38:

Copy of all insurance policies covering the **HELMERICH & PAYNE INTERNATIONAL DRILLING CO..**

Respectfully Submitted:



JOSEPH A. GREGORIO
1100 Benton Road
Bossier City, Louisiana 71111
Telephone No. (318) 747-0384
Telecopier No. (318) 746-5222
La Bar No. 22, 191
ATTORNEY FOR PLAINTIFF, MAULDIN

C E R T I F I C A T E

I, JOSEPH A. GREGORIO, counsel for plaintiffs, do hereby certify that I have submitted written and numbered Interrogatories and Requests for Production of Documents Propounded by Plaintiffs to Defendant, **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** on the 18 day of March, 2022. A copy of the Interrogatories and Requests for Production to Defendant, **HELMERICH & PAYNE INTERNATIONAL DRILLING CO.** has been served upon defendants via attachment to the original petition.



JOSEPH A. GREGORIO

Bossier Parish Clerk of Court **C-166988**
Filed Mar 21, 2022 11:15 AM **A**
Katie F. Best
Deputy Clerk of Court

TIA N. MAULDIN

DOCKET NO. _____

VERSUS

26TH JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, JR., ET AL

BOSSIER PARISH, LOUISIANA

ASSIGNMENT:

SECTION ____ JUDGE ____

ORDER

THE FOREGOING PETITION CONSIDERED:

IT IS ORDERED that defendants, **RICHARD L. SADDLER, JR., HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** be served with a copy of their petition and duly cited to appear and answer same;

IT IS FURTHER ORDERED that defendants be directed to answer the attached interrogatories, request for production of documents and request for admissions within the time delays provided by law;

IT IS ORDERED THAT defendants be directed to produce and file into Court, within the delays allowed by law for pleading to this petition, the following documents:

- A) Statements taken from **TIA N. MAULDIN**;
- B) Photographs taken of the vehicles involved;
- C) Photographs taken at the scene of the accident; and,
- D) Any policies of public liability or property damage insurance covering this accident.

IT IS FURTHER ORDERED that the defendants, **RICHARD L. SADDLER, JR., HELMERICH & PAYNE INTERNATIONAL DRILLING CO. and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA** produce and make available to petitioners the original or a certified copy of any and all insurance policies, including all attachments, endorsements and excess policies, which provided coverage for the injuries and damages sustained by petitioners as a result of the accident described in the foregoing petition.

THUS DONE AND SIGNED in Benton, Bossier Parish, Louisiana, on this 21 day of March, 2022.



JUDGE
MICHAEL NERREN

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688 and
Part G, §13, Louisiana Supreme Court General Administrative Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

TIA MAULDIN vs. RICHARD L. SADDLER, JR

Court: 26TH JDC Docket Number:

Parish of Filing: BOSSIER Filing Date:

Name of Lead Petitioner's Attorney: Joseph A. Gregorio

Name of Self-Represented Litigant:

Number of named petitioners: 1 Number of named defendants: 3

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- | | |
|---|--|
| <input checked="" type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | |
| <input type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:

Defendant turned left and hit plaintiff

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name Joseph A. Gregorio Signature

Address 1100 Benton Road, Bossier City, LA 71111

Phone number: 318-747-0384 E-mail address: staff2@bossiercitylawyer.com

Bossier Parish Clerk of Court
Filed Mar 21, 2022 11:15 AM C-166988
Katie F. Best
Deputy Clerk of Court
A

JOSEPH A. GREGORIO

Attorney and Counselor at Law

1100 Benton Road
Bossier City, Louisiana 71111-3608
Telephone: 318-747-0384
Facsimile: 318-746-5222

March 18, 2022

Ms. Jill M. Sessions
Bossier Parish Clerk of Court
204 Burt Blvd. 3rd floor
Benton, LA 71006

Re: Mauldin v Saddler, et al
26th JDC, Bossier Parish, Louisiana

Dear Ms. Sessions:

Enclosed herewith please find the original and five copies of our Petition for Damages in the above captioned matter. Please file same, serve as indicated and return stamped copy in the self-addressed postage-paid envelope attached for your convenience. I have also enclosed a check in the amount of \$800.00 to cover the cost of this request.

Your time and assistance are greatly appreciated.

Sincerely,

Joseph A. Gregorio
Attorney at Law

JAG/aa
enclosures

D5961834

CITATION
WITH DISCOVERY

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: HELMERICH & PAYNE INTERNATIONAL DRILLING CO
THROUGH THE CORPORATION SERVICE COMPANY
501 LOUISIANA AVENUE
BATON ROUGE, LA 70802

in the Parish of EAST BATON ROUGE.

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, or to file your answer or other pleading to said petition in the office of the Clerk of the 26th Judicial District Court in the Bossier Parish Court House in the Town of Benton in said Parish within thirty (30) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of judgment against you.

The Sheriff or his deputy has just handed you a law suit which states why you are being sued. You (as defendant) will have thirty (30) days after you receive this petition to either file an answer (in writing) with the Bossier Parish Clerk of Court in Benton, Louisiana, or retain an attorney of your choice to act in your behalf. If you do nothing within the said time period, then a judgment could be rendered against you.

Attached hereto are:

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS; INTERROGATORIES

Witness the Honorable Judges of our said Court on this the 22nd day of March, 2022

Jill M. Sessions, CLERK OF COURT

I made service on the named party through the
CORPORATION SERVICE COMPANY

APR 05 2022
by tendering a copy of this document to
MELISSA HARDIN

DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, Louisiana



Breanne Ioth

Deputy Clerk

Attorney:
JOSEPH A. GREGORIO
318-747-0385

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐

UNSERVED ☐

GIVEN TO: _____

REMARKS: _____

FILED

APR 18 2022

Sarah Shehane
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

DEPUTY SHERIFF



D5961958

CITATION
WITH DISCOVERY

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: RICHARD L SADDLER JR
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

in the Parish of EAST BATON ROUGE.

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, or to file your answer or other pleading to said petition in the office of the Clerk of the 26th Judicial District Court in the Bossier Parish Court House in the Town of Benton in said Parish within thirty (30) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of judgment against you.

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Attached hereto are:

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS; INTERROGATORIES

Witness the Honorable Judges of our said Court on this the 22nd day of March, 2022

I made service on the named party through the

Office of the Secretary of State on

APR 05 2022

by tendering a copy of this document to:
JULIE NESBITT

DY. M. LOCKWOOD #0803

Deputy Sheriff, Parish of East Baton Rouge, LA



Jill M. Sessions, CLERK OF COURT

Breanne Ioth

Deputy Clerk

Attorney:
JOSEPH A. GREGORIO
318-747-0385

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐

UNSERVED ☐

GIVEN TO: _____

REMARKS: _____

FILED

APR 18 2022
Sarah Shekane
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

DEPUTY SHERIFF

D5961966

NOTICE

N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: RICHARD L SADDLER JR
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

OF THE PARISH OF EAST BATON ROUGE..... GREETING:

YOU ARE HEREBY NOTIFIED THAT ALL IS AS SHOWN BY the certified
copy of the pleadings which accompanies this NOTICE AND HEREIN FAIL NOT .

A COPY OF SAID

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS;
INTERROGATORIES

is hereto attached and made a part hereof.

Given under my hand and seal, Officially, on this the 22nd day of March, 2022.

Attorney:
JOSEPH A. GREGORIO
318-747-0385

I made service on the named party through the
Office of the Secretary of State on

APR 05 2022

by tendering a copy of this document to:
JULIE NESBITT

DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, LA

Jill M. Sessions, CLERK OF COURT



Breanne Ioth

Deputy Clerk

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐

UNSERVED ☐

GIVEN TO: _____

REMARKS: _____

DEPUTY SHERIFF

FILED
APR 18 2022
Sarah Shekane
DEPUTY CLERK
20TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

D5961933

ORDER TO PRODUCE

TIA MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: RICHARD L SADDLER JR
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

OF THE PARISH OF EAST BATON ROUGE GREETINGS:

YOU ARE HEREBY COMMANDED in the name of the State of Louisiana and of the Twenty-Sixth
Judicial District Court for Bossier Parish, Louisiana, to produce the items listed in the attached pleadings.

AND HEREIN FAIL NOT UNDER PENALTY OF THE
LAW. WITNESS THE HONORABLE JUDGE OF OUR
SAID COURT, ON THE 22nd day of March, 2022

I made service on the named party through the

Office of the Secretary of State on

APR 05 2022

by tendering a copy of this document to:

JULIE NESBITT

DY. M. LOCKWOOD #0803

Deputy Sheriff, Parish of East Baton Rouge, LA

Jill M. Sessions, CLERK OF COURT



Breanne Ioth

Deputy Clerk
Bossier Parish, Louisiana

Attorney: JOSEPH A. GREGORIO
318-747-0385

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐

UNSERVED ☐

GIVEN TO: _____

REMARKS: _____

FILED
APR 18 2022
S. Shehane
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

DEPUTY SHERIFF

D5961818

ORDER TO PRODUCE

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***


TO: HELMERICH & PAYNE INTERNATIONAL DRILLING CO
THROUGH THE CORPORATION SERVICE COMPANY
501 LOUISIANA AVENUE
BATON ROUGE, LA 70802

OF THE PARISH OF EAST BATON ROUGE GREETINGS:

YOU ARE HEREBY COMMANDED in the name of the State of Louisiana and of the Twenty-Sixth
Judicial District Court for Bossier Parish, Louisiana, to produce the items listed in the attached pleadings.

AND HEREIN FAIL NOT UNDER PENALTY OF THE
LAW. WITNESS THE HONORABLE JUDGE OF OUR
SAID COURT, ON THE 22nd day of March, 2022

I made service on the named party through the
CORPORATION SERVICE COMPANY
APR 05 2022
by tendering a copy of this document to
MELISSA HARDIN
DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

Jill M. Sessions, CLERK OF COURT
 Breanne John

Attorney: JOSEPH A. GREGORIO
318-747-0385

Deputy Clerk
Bossier Parish, Louisiana
FILED
APR 18 2022
Sarah Shehane
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

SERVICE INFORMATION

DATE: _____
PERSONAL ☐
DOMICILIARY ☐ GIVEN TO: _____
UNSERVED ☐ REMARKS: _____

DEPUTY SHERIFF

D5961842

NOTICE

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: HELMERICH & PAYNE INTERNATIONAL DRILLING CO
THROUGH THE CORPORATION SERVICE COMPANY
501 LOUISIANA AVENUE
BATON ROUGE, LA 70802

OF THE PARISH OF EAST BATON ROUGE..... GREETING:

YOU ARE HEREBY NOTIFIED THAT ALL IS AS SHOWN BY the certified
copy of the pleadings which accompanies this NOTICE AND HEREIN FAIL NOT .

A COPY OF SAID

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS;
INTERROGATORIES

is hereto attached and made a part hereof.

Given under my hand and seal, Officially, on this the 22nd day of March, 2022.

Attorney:
JOSEPH A. GREGORIO
318-747-0385

I made service on the named party through the
CORPORATION SERVICE COMPANY
APR 05 2022
by tendering a copy of this document to
MELISSA HARDIN
DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

Jill M. Sessions, CLERK OF COURT



Breanne Toth

Deputy Clerk

SERVICE INFORMATION	
DATE: _____	
PERSONAL <input type="checkbox"/>	
DOMICILIARY <input type="checkbox"/>	GIVEN TO: _____
UNSERVED <input type="checkbox"/>	REMARKS: _____

DEPUTY SHERIFF

FILED
APR 18 2022
Sarah Shehane
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

D5961875

CITATION
WITH DISCOVERY

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***

TO: NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH PA
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

in the Parish of EAST BATON ROUGE.

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, or to file your answer or other pleading to said petition in the office of the Clerk of the 26th Judicial District Court in the Bossier Parish Court House in the Town of Benton in said Parish within thirty (30) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of judgment against you.

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Attached hereto are:

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS; INTERROGATORIES

Witness the Honorable Judges of our said Court on this the 22nd day of March, 2022

Jill M. Sessions, CLERK OF COURT

~~Made service on the named party through the~~
Office of the Secretary of State on

APR 05 2022

by tendering a copy of this document to:
JULIE NEBBITT

DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, LA

Attorney:
JOSEPH A. GREGORIO
318-747-0385



Breanne Ioth

FILED Deputy Clerk

APR 10 2022
Kate Best
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐

UNSERVED ☐

GIVEN TO: _____

REMARKS: _____

DEPUTY SHERIFF

made service on the named party, through the
Office of the Secretary of State on

ARR 015 2022

by tendering a copy of this document to:
JULIE NESBITT

DK. M. LOCKWOOD #0808
Deputy, Sheriff, Parish of East Baton Rouge, LA

Sid J. Gautreaux
Sheriff East Baton Rouge Parish

FILED
APR 19 2022
Katie Best
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

Clerk of Court Bossier Parish
P.O. Box 430
Benton, LA 71006

DISTRICT COURT
For the Parish of East Baton Rouge
4/4/2022

Case: (08) 166988 TIA N MAULDIN vs RICHARD L SADDLER JR ET AL
1,756,868

Nbr	Date	Service Type	Charges
7	04/04/2022	Citation	\$30.00
		; 1 SOS; BATON ROUGE, LA 70809	
7	04/04/2022	Mileage Charge	\$9.36
Case Total:			\$39.36
Total:			\$39.36

Please make check payable to:
Sid J. Gautreaux, Sheriff
P.O. Box 3277
Baton Rouge, LA 70821

PLEASE RETURN THIS BILL WITH CHECK

D5961883

NOTICE

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE***

TO: NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH PA
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

OF THE PARISH OF EAST BATON ROUGE..... GREETING:

YOU ARE HEREBY NOTIFIED THAT ALL IS AS SHOWN BY the certified
copy of the pleadings which accompanies this NOTICE AND HEREIN FAIL NOT .

A COPY OF SAID

PETITION FOR DAMAGES; REQUEST FOR ADMISSIONS;
INTERROGATORIES

is hereto attached and made a part hereof.

Given under my hand and seal, Officially, on this the 22nd day of March, 2022.

Attorney:
JOSEPH A. GREGORIO
318-747-0385

I made service on the named party through the *Jill M. Sessions*, CLERK OF COURT
Office of the Secretary of State on

APR 05 2022

by tendering a copy of this document to:
JULIE NESBITT

DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, LA



Breanne Ioth

Deputy Clerk

SERVICE INFORMATION

DATE: _____

PERSONAL ☐

DOMICILIARY ☐ GIVEN TO: _____

UNSERVED ☐ REMARKS: _____

DEPUTY SHERIFF

FILED
APR 10 2022
Katie B...
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

Sid J. Gautreaux
Sheriff East Baton Rouge Parish

FILED
APR 19 2022
[Signature]
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

Clerk of Court Bossier Parish
P.O. Box 430
Benton, LA 71006

DISTRICT COURT
For the Parish of East Baton Rouge
4/4/2022

Case: (08) 166988 TIA N MAULDIN vs RICHARD L SADDLER JR ET AL
1,756,868

Nbr	Date	Service Type	Charges
NO SOS CHECK			
8	04/04/2022	Notice	\$30.00
		; 1 SOS; BATON ROUGE, LA 70809	
8	04/04/2022	Mileage Charge	\$9.36
Case Total:			\$39.36
Total:			\$39.36

Please make check payable to:
Sid J. Gautreaux, Sheriff
P.O. Box 3277
Baton Rouge, LA 70821

PLEASE RETURN THIS BILL WITH CHECK

D5961859

ORDER TO PRODUCE

TIA N MAULDIN	TWENTY-SIXTH JUDICIAL DISTRICT
VS	PARISH OF BOSSIER
RICHARD L SADDLER JR ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-166988	***PERSONAL SERVICE ONLY***


TO: NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH PA
THROUGH THE LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA 70809

OF THE PARISH OF EAST BATON ROUGE GREETINGS:

YOU ARE HEREBY COMMANDED in the name of the State of Louisiana and of the Twenty-Sixth
Judicial District Court for Bossier Parish, Louisiana, to produce the items listed in the attached pleadings.

AND HEREIN FAIL NOT UNDER PENALTY OF THE
LAW. WITNESS THE HONORABLE JUDGE OF OUR
SAID COURT, ON THE 22nd day of March, 2022

I made service on the named party through the
Office of the Secretary of State on
APR 05 2022
by tendering a copy of this document to:
JULIE NESBITT
DY. M. LOCKWOOD #0803
Deputy Sheriff, Parish of East Baton Rouge, LA

Jul M. Sessions, CLERK OF COURT
 Breanne John

Attorney: JOSEPH A. GREGORIO
318-747-0385

Deputy Clerk
Bossier Parish, Louisiana
FILED
APR 19 2022
Katie Best
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

SERVICE INFORMATION

DATE: _____
PERSONAL ☐
DOMICILIARY ☐ GIVEN TO: _____
UNSERVED ☐ REMARKS: _____

DEPUTY SHERIFF

FILED
APR 19 2022
[Signature]
DEPUTY CLERK
26TH JUDICIAL DISTRICT COURT
BOSSIER PARISH, LOUISIANA

Sid J. Gautreaux
Sheriff East Baton Rouge Parish

Clerk of Court Bossier Parish
P.O. Box 430

Benton, LA 71006

DISTRICT COURT
For the Parish of East Baton Rouge
4/4/2022

Case: (08) 166988 TIA N MAULDIN vs RICHARD L SADDLER JR ET AL
1,756,868

Nbr	Date	Service Type	Charges
NO SOS CHECK			
9	04/04/2022	Order ; 1 SOS; BATON ROUGE, LA 70809	\$30.00
9	04/04/2022	Mileage Charge	\$9.36
Case Total:			\$39.36
Total:			\$39.36

Please make check payable to:
Sid J. Gautreaux, Sheriff
P.O. Box 3277
Baton Rouge, LA 70821

PLEASE RETURN THIS BILL WITH CHECK

Bossier Parish Clerk of Court
Filed Apr 25, 2022 12:15 PM
Katie F. Best
Deputy Clerk of Court
E-File Received Apr 25, 2022 12:00 PM
C-166988
A

TIA N. MAULDIN

DOCKET: 166,988-C

VERSUS

26TH JUDICIAL DISTRICT COURT

RICHARD L. SADDLER, ET AL

BOSSIER PARISH, LOUISIANA

AFFIDAVIT OF SERVICE UNDER THE LOUISIANA LONG-ARM STATUTE LSA-R.S.
13:3201, ET. SEQ.

STATE OF LOUISIANA

PARISH OF BOSSIER

BEFORE ME, the undersigned authority, personally came and appeared, Amber Adkins,
secretary to Joseph A. Gregorio, who being first duly sworn, did depose and state:

That on the 23rd day of March, 2022, she mailed a certified copy of the Petition for Damages,
Citation, Request for Admissions, Interrogatories and Request for Production which were filed in the
lawsuit entitled Tia N. Mauldin v Richard L. Saddler, et al; Docket No. 166,988-C; 26th JDC; Bossier
Parish, Louisiana, under the Louisiana Long-Arm Statute LSA-R.S. 13:3201, pursuant to Section 3204
Title 13, to Richard L. Saddler by sending same to defendant, Richard L. Saddler, by certified mail,
article number 7020 1290 0000 6714 1723, properly addressed and postage prepaid.

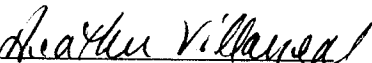
She attaches the return receipt of service on the defendant, Richard L. Saddler, which shows the
date the Petition for Damages, Citation, Request for Admissions, Interrogatories and Request for
Production which were filed in the lawsuit entitled Tia N. Mauldin v Richard L. Saddler, et al; Docket
No. 166,988-C; 26th JDC; Bossier Parish, Louisiana was returned, not served and not received by the
defendant, Richard L. Saddler.


Amber Adkins


SWORN TO AND SUBSCRIBED, before me, the undersigned Notary Public, on this the 25 day
of April, 2022

NOTARY PUBLIC

WITNESS


WITNESS



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<div>■ Complete items 1, 2, and 3.</div> <div>■ Print your name and address on the reverse so that we can return the card to you.</div> <div>■ Attach this card to the back of the mailpiece, or on the front if space permits.</div>		<div>A. Signature<div><div>X</div><div><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</div></div></div>	
<div>1. Article Addressed to:</div> <div>Richard L. Saddler, Jr. 734 Polk County Road 16 Cove, AR 71937</div>		<div>B. Received by (Printed Name)</div>	<div>C. Date of Delivery</div>
<div> 9590 9402 6887 1104 4116 25</div>		<div>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</div>	
<div>2. Article Number (Transfer from service label) 7020 1290 0000 6714 1723</div>		<div>3. Service Type<div><div><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</div><div><input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</div></div></div>	

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

**JONES
WALKER**

Christopher S. Mann
D: 504.582.8332
F: 504.582.8332
cmann@joneswalker.com

April 27, 2022

Via US Mail:

Bossier Parish Courthouse
ATTN: Civil Copies
204 Burt Blvd., Third Floor
P.O. Box 430
Benton, LA 71006

Re: Tia N. Mauldin v. Richard L. Saddler and H&P, Inc.
26th Judicial District Court of Bossier Parish
Docket No.: C-166988


Dear Sir/Madam:

Our office spoke with a representative in the Civil Copies Department on Wednesday, April 27, 2022 to request the entire 45 page docket in the above-referenced matter.

Per the instructions we received in that conversation, enclosed, please find a prepaid overnight FedEx return envelope to be used to send the docket to our office, as well as a check in the amount of \$45.00 to cover the associated copying fees.

If you have any questions, please do not hesitate to contact our office.

Sincerely,



Christopher S. Mann

CSM /eln
Enclosures

#100364757v1{N4422651.1}

Bossier Parish Clerk of Court
P.O. Box 430
Benton, LA 71006
Telephone(318) 965-2336

Receipt#	Date Paid	Check	Cash	CC	Total	Check#	CC Info	Office Data
1298453	04/28/22	45.00	0.00	0.00	45.00	1431	Ref#:	ksitter/42779/ksitter

Remitter JONES WALKER L.L.P.

Notes

Invoice#	Customer #	Name
04421992	1	CASH CUSTOMER

Description	Date	Quantity	Amount
CHARGE: CIVIL COPIES Copy of Entire Record (C-166988)	4/28/2022	1	45.00
PAYMENT	4/28/2022		(45.00)
BALANCE DUE			0.00

THIS IS NOT A BILL!
THIS IS A RECEIPT FOR A PAID TRANSACTION.
PLEASE KEEP FOR YOUR RECORDS.